

Exhibit 8

Jassy Declaration

Page 1

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

JANE DOE CIVIL ACTION NO.
3:22-CV-00338-BAJ-SDJ

VERSUS

BOARD OF SUPERVISORS OF JUDGE BRIAN A. JACKSON
THE UNIVERSITY OF
LOUISIANA SYSTEM; BOARD OF MAGISTRATE JUDGE
SUPERVISORS OF LOUISIANA SCOTT D. JOHNSON
STATE UNIVERSITY AND
AGRICULTURAL AND
MECHANICAL COLLEGE; and
LAFAYETTE CITY-PARISH
CONSOLIDATED GOVERNMENT

* * * * *

TRANSCRIPT OF THE VIDEOTAPED DEPOSITION OF:

JANE DOE,
TAKEN ON BEHALF OF BOARD OF SUPERVISORS OF THE
UNIVERSITY OF LOUISIANA SYSTEM, REPORTED IN THE ABOVE
ENTITLED AND NUMBERED CAUSE BY YOLANDA J. PENA,
CERTIFIED COURT REPORTER FOR THE STATE OF LOUISIANA.

* * * * *

REPORTED AT THE LAW OFFICES OF:
CAZAYOUX EWING LAW FIRM
257 MAXIMILIAN STREET
BATON ROUGE, LOUISIANA 70802
Job No. CS6079529
COMMENCING AT 10:04 A.M., ON SEPTEMBER 20, 2023

A P P E A R A N C E S

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A P P E A R A N C E S (Continued)

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ALSO PRESENT:

JEFFREY HORNER, VIDEOGRAPHER

REPORTED BY:

YOLANDA J. PENA

CCR NO. 2017002, RPR

STATE OF LOUISIANA

1 Q. Has anyone reached out to you by text?

2 A. No.

3 Q. Has anyone reached out to you on any social
4 media platform?

5 A. No.

6 Q. Has anyone confronted you in person?

7 A. No.

8 Q. In your complaint, you allege that LSU banned
9 Silva from LSU's campus in the spring of 2015. What
10 evidence do you have that LSU banned Silva from the
11 campus?

12 A. I was not aware of this until the Kenny Jacoby
13 article came out. I believe that was something in --
14 in the Kenny Jacoby article, or if not, it was
15 something that was uncovered by my attorney. And so
16 I'm assuming that those are -- the evidence of that is
17 in the hands of either Kenny Jacoby or my attorney.

18 Q. Okay. So your only -- as you sit here today,
19 the only information you have about LSU banning Victor
20 Daniel Silva from its campus is -- arises out of the
21 Kenny Jacoby article?

22 A. Yes.

23 Q. You independently do not have any other
24 information other than what is in the Kenny Jacoby
25 article?

1 A. Correct.

2 Q. In your complaint, you allege that it was a
3 fluke that a -- I'm going -- I'm going to refer to the
4 University of Louisiana at Lafayette as ULL.

5 A. Okay.

6 Q. -- that it was a fluke that a ULL
7 administrator learned of Silva's arrest -- I'm
8 referring to Victor Daniel Silva as Silva. Is that
9 fair?

10 A. That's fair.

11 Q. Okay. So I'll start over one more time.

12 It was a fluke that a ULL administrator
13 learned of Silva's arrest for rape in Baton Rouge.
14 What do you mean by "fluke"?

15 A. Again, this is all information that I do not
16 know firsthand, so this is stuff that -- information
17 that I have received either from my attorney or from
18 the Kenny Jacoby article.

19 Q. Okay. That's fair.

20 What information do you have that a ULL
21 administrator learned of Silva's arrest for rape in
22 Baton Rouge?

23 MS. BECK: Objection; asked and
24 answered.

25 You can -- you can answer.

1 BY MS. GIERING:

2 Q. Is your answer any different than the question
3 I asked about it being a fluke?

4 A. No, ma'am.

5 Q. Okay. So you don't have any information
6 independently?

7 A. Independently, no.

8 Q. Okay. Thank you.

9 Your complaint goes on to say that "certainly
10 not through any formal notification from LSU or its
11 Title IX office."

12 Do -- what do you mean by "formal
13 notification"?

14 A. Again, this is information that I do not have
15 independently or firsthand. This is information that I
16 received from Kenny Jacoby, the journalist, and my
17 attorney.

18 Q. Okay. What evidence do you have that ULL
19 never followed up with LSU or Baton Rouge law
20 enforcement for additional information concerning
21 Silva?

22 A. I can only speak to what I experienced with
23 Ruston PD and Louisiana Tech University. That's
24 information that Kenny Jacoby and my attorney would
25 have known.

1 Q. Okay. And I'm going to be asking a series of
2 questions.

3 A. Yes.

4 Q. If that same answer applies, if it's okay with
5 your attorney, in the interest of time, you can just
6 say "I have no independent information."

7 A. Okay.

8 MS. GIERING: Is that fair?

9 MS. BECK: Yes, that's fair.

10 BY MS. GIERING:

11 Q. Okay. In your complaint, it says -- what do
12 you mean by ULL "merely placed Silva on disciplinary
13 probation"?

14 A. I have no independent information.

15 Q. What evidence do you have that the UL
16 System -- and I'm going to pause here.

17 Are you aware that ULL and Louisiana Tech
18 University are two of many universities that are part
19 of what is referred to as the University of Louisiana
20 System?

21 A. Yes.

22 Q. Okay. And I am going to refer to that system
23 as the UL System. Is that fair?

24 A. That's fair.

25 Q. Okay. What evidence do you have that the UL

1 System knew about Silva's arrest in Baton Rouge?

2 MS. BECK: I'm going to object to this
3 question to the extent it calls for a legal
4 conclusion.

5 And with that, you can answer.

6 A. Can you state it one more time? I'm sorry.

7 BY MS. GIERING:

8 Q. Yes. Subject to the same objection, what
9 evidence do you have that UL System knew about Silva's
10 arrest in Baton Rouge?

11 A. I have no independent information.

12 Q. What evidence do you have that supports your
13 allegation that UL System, Louisiana Tech University,
14 or ULL "took no steps to protect female tech students
15 from Silva or even provide them the information they
16 needed to protect themselves"?

17 A. I can only speak to Louisiana Tech in this
18 answer --

19 Q. Okay.

20 A. -- because that's who I have personal
21 experience with. After -- I was not provided by
22 Carrie Flournoy, who was the Title IX officer, with any
23 paperwork having to do with her as -- as a Title IX
24 officer. And then of course after the Kenny Jacoby
25 article came out, I found out then -- and of course,

1 again, that's not independent information, so I suppose
2 I can't speak to it. But I found out then that they
3 had not communicated or withheld his transcript.

4 Q. Okay. So for that latter part of your answer,
5 you said after the article, you learned that Tech had
6 not communicated or withheld his transcript. Am I --

7 A. Correct.

8 Q. Did I accurately state -- state that?

9 A. Yes.

10 Q. And so my understanding of that answer is that
11 the article is where you gained information that Tech
12 had not communicated and had not withheld Silva's
13 transcript; is that correct?

14 A. Correct. And it may also be my own attorney's
15 findings. I'm not sure --

16 Q. Okay.

17 A. -- where -- yeah.

18 Q. Okay. I'm taking your attorney's find- --
19 your attorney's findings out of it. I'm -- your --
20 your knowledge and --

21 A. Yep.

22 Q. -- your information. Okay.

23 You said you were not provided, by Carrie
24 Flournoy, any paperwork. What do you mean by that?

25 A. When I reported to the Title IX office at

1 Louisiana Tech -- it was in December of 2018 -- Carrie
2 Flournoy did not inform me of who she was as a Title IX
3 officer, what my rights were under Title IX, what the
4 protocol was for Title IX cases.

5 You know, I'm not sure that -- if that
6 would've looked like paperwork or her verbally saying
7 that to me, but I was not provided with any of those
8 things. And of course this is hindsight, that I'm
9 saying that I know that she did not do that. At the
10 time, this was not in my head. At -- at the time that
11 I reported to her, I assumed that she was doing her due
12 diligence and performing her job.

13 Q. Okay. What do you mean in your complaint that
14 the UL System, Louisiana Tech, or ULL took no steps to
15 protect female Tech students?

16 A. I have no independent information.

17 Q. Prior to September of 2018, did you have an
18 expectation that Louisiana Tech University was required
19 to protect female students?

20 A. Prior to September of 2018?

21 Q. Correct.

22 MS. BECK: Objection. I'm just going to
23 object, form.

24 Go ahead.

25 A. Again, this is a "hindsight is 20/20"

1 situation, I think. I was a student at this
2 institution.

3 BY MS. GIERING:

4 Q. Uh-huh.

5 A. I had professors and people above me,
6 administrators, like a -- like an academic -- or
7 student academic adviser, things like that. So -- so
8 I think the culture was that the university was there
9 for students.

10 Q. Uh-huh.

11 A. In hindsight, I -- that -- okay. Sorry.
12 Because of that culture, I assumed that the university
13 would carry out all of the -- I had the expectation
14 that the university would -- would carry out all of the
15 due process that it could carry out in order to protect
16 its students in that -- the only way I could say this
17 is like I felt as if we were on the same team --

18 Q. Uh-huh.

19 A. -- me and the university, because of course,
20 why -- why would we not be.

21 Q. Uh-huh.

22 A. Right? I was a student there. And so my
23 expectations were not that -- because I didn't know I
24 would need protecting --

25 Q. Uh-huh.

1 A. -- my expectations were not that they were
2 there to protect me but -- but that they were there on
3 my team.

4 Q. Okay.

5 A. I guess does that make sense?

6 Q. It does make sense. Thank you.

7 Prior to September of 2018, was there ever a
8 time that you did not feel safe at -- as a student at
9 Louisiana Tech University?

10 A. That's tricky. As women, I feel like there's
11 often situations in which we don't feel safe. I went
12 to maybe one or two frat parties that I just had in the
13 back of my mind "I need to be careful here."

14 Q. Uh-huh.

15 A. But I -- I can't -- I can't speak specifically
16 to whether or not there were moments that I felt --
17 specific moments that I felt safe or unsafe at
18 Louisiana Tech.

19 Q. Okay. Now, the -- the frat parties that you
20 would go to and you -- in the back of your mind, you
21 were thinking -- well, let me ask the question.

22 What -- what were you thinking in the back of
23 your mind?

24 A. Again, this was maybe one or two parties that
25 I attended. And -- and usually they were "cover your

1 came to retain them.

2 A. My brother Calvin --

3 Q. Uh-huh.

4 A. -- found them. I'm -- I'm not sure exactly
5 how they found -- he found them, but he suggested to me
6 that I contact them, and I did.

7 Q. Okay. And when -- approximately when was
8 that?

9 A. It was after the Kenny Jacoby article was
10 published. I don't know exactly how long after.

11 Q. Were you ever approached by Kenny Jacoby to
12 interview you for his article?

13 A. Yes.

14 Q. When did he approach you?

15 A. I don't exactly remember when that was.

16 Q. What year?

17 A. The article was pub- -- I believe that it was
18 either the end of 2019 or early 2020.

19 Q. Okay. And how did he contact you?

20 A. I don't recall exactly, as I'm sitting here,
21 where our first contact was.

22 Q. Was it an email?

23 A. Maybe, yes. I don't recall exactly.

24 Q. And did you respond to his email?

25 A. Yes.

1 Q. Okay.

2 A. Or -- well, I'm sorry. I don't know if it was
3 an email, but I did respond to whatever -- however he
4 contacted me for --

5 Q. Was it in writing or -- whether that's
6 electronic or not, or was it by -- verbally? Did he
7 call you?

8 A. I believe it was in writing.

9 Q. Okay. And --

10 A. I -- I can't recall exactly.

11 Q. You don't -- do you -- do you recall if you
12 received text messages from him?

13 A. In order to contact me for this -- or --

14 Q. Yes.

15 A. I don't recall if that's how he contacted me
16 for -- in order to interview me for --

17 Q. And at some point, you said there was -- there
18 were some emails?

19 MS. BECK: Objection; form.

20 A. Again, I don't know exactly how he -- he and I
21 communicated. I don't -- I don't exactly remember, as
22 I'm sitting here right now, whether it was he called me
23 or email me or texted me. I don't exactly recall right
24 now.

25 BY MS. GIERING:

1 Q. Okay. Did you provide information to him?

2 A. Yes.

3 Q. Did you provide documents to him?

4 A. Not that I can recall, as I'm sitting here
5 right now.

6 Q. Do you have those emails?

7 MS. BECK: Objection; form.

8 A. I -- again, I don't know if -- if I emailed
9 him or -- or what. I provided any communication that I
10 felt would be relevant to this -- to my attorney, but
11 I -- I don't know -- as I'm sitting here right now,
12 I -- I really can't recall how that -- that
13 relationship began or -- or continued.

14 BY MS. GIERING:

15 Q. But you did -- you -- you did participate in
16 communications with Kenny Jacoby?

17 A. Yes.

18 Q. And you did provide him information for his
19 article?

20 A. Most of that was over the phone, yes.

21 Q. Okay. But there was some in written
22 communications?

23 A. Again, I don't remember exactly what was in
24 written communications. From what I can remember, as
25 I'm sitting here right now, those written

1 communications were us setting up phone calls in
2 order to -- for him to interview me.

3 Q. Did you ever meet with him in person?

4 A. No.

5 Q. So you are aware he was preparing an
6 investigative piece?

7 MS. BECK: Objection; form.

8 You can answer.

9 A. Yes. I wasn't sure the scope of that piece
10 or exactly what -- what that piece would look like, but
11 I -- I was aware that he was preparing --

12 BY MS. GIERING:

13 Q. Did anyone on Kenny Jacoby's behalf contact
14 you about his investigative piece?

15 A. What do you mean by on his behalf?

16 Q. Somebody he worked with, somebody who was
17 helping him with his article, somebody who was doing
18 some investigation for him for his article?

19 A. No, not --

20 Q. Just him?

21 A. -- that I can recall. Yeah.

22 Q. Okay.

23 A. Yes.

24 Q. Did he provide you with an advanced copy of
25 the article?

1 A. No.

2 Q. Did he provide you with a copy of the article
3 after it was completed?

4 A. No.

5 Q. Did he tell you when it was going to be
6 published?

7 A. Yes.

8 Q. Okay. And so you were looking for it whenever
9 it came out?

10 A. Yes.

11 Q. Did anybody send you a copy of it?

12 A. No. Not that -- after it was published, not
13 that I can recall. But do you mean before it was
14 published? I'm sorry.

15 Q. Either.

16 A. Certainly not before it was published. That
17 was what my original "no" was to. And then after it
18 was published, I -- I can't recall if -- no. I would
19 expect not, no.

20 MS. GIERING: Counsel, we'll -- we'll
21 send you a supplemental request for
22 production. But we're going to call for
23 production of any writings, emails, texts,
24 anything with Kenny Jacoby and Ms. Doe.

25 BY MS. GIERING:

1 Q. In page 10 of your complaint, you allege that
2 you learned for the first time that defendant had
3 permitted Silva to transfer back to ULL after you
4 reported him for rape where he remained under the
5 board's control and authority as a student without
6 investigation or any disciplinary action until he
7 graduated in 2019.

8 How would stopping Silva from resigning from
9 Tech have changed what happened to you?

10 MS. BECK: Objection; form.

11 You can answer, if you can.

12 A. Sorry. Say it one more time, just the -- just
13 the second part.

14 BY MS. GIERING:

15 Q. How would stopping Silva from resigning from
16 Tech have changed what happened to you?

17 A. By what "happened to you," I'm assuming you're
18 meaning --

19 Q. The assault?

20 A. -- the assault.

21 Q. Yes.

22 A. It would not have changed --

23 Q. How would that have changed the sexual
24 assault?

25 A. That would not have changed the assault.

1 All of the other things alleged in the claim may have
2 changed the assault, but I guess we can't speculate
3 on that, things like him being transferred to Tech
4 without -- without a spot on his record and -- and
5 these things not being communicated. But -- but him
6 transferring somewhere else, I suppose would not have
7 changed anything about the assault itself. It
8 certainly did end up betraying my trust in the system,
9 right. But yeah. I'm sorry, yeah.

10 Q. What information do you have that he
11 transferred from Tech?

12 A. Is that what you just --

13 Q. No. I said with- -- I said "resigned."

14 A. Oh, resigned. I'm sorry. I didn't mean to
15 say "transfer."

16 Q. Okay, okay.

17 A. Resigned from -- from Tech and ended up -- he
18 did end up attending UL Lafayette, right, after that
19 and graduated.

20 Q. Do you know that?

21 A. That's what it said in the Kenny Jacoby
22 article, so I'm assuming that that's correct. So when
23 I say "transferred," I think that's what I mean.

24 Q. Okay. You allege several times in your
25 lawsuit that the board allowed Silva to transfer, with

1 which we disagree, but for purposes of your deposition,
2 let's assume that Silva tried to leave Tech and could
3 not. That would not have changed the sexual assault
4 that happened to you, correct?

5 A. Correct.

6 Q. Tech agreed to meet with you when you emailed
7 Carrie Flourney on December 13th, 2018, correct?

8 A. Correct. And I do just want to -- I do just
9 want to make a -- a correction to my previous statement
10 where you said that him leaving would not have changed
11 my sexual assault, right?

12 Q. Correct.

13 A. And I know that this is a technicality, but I
14 mean, I think in -- from what I've learned in therapy
15 that, like, there are, like, secondary traumas after a
16 trauma. And while it did not change the fact that I
17 was in that initial moment assaulted --

18 Q. Uh-huh.

19 A. -- I do think that it had lasting effects on
20 how I -- I processed that assault afterwards. So I'm
21 sorry. That was a technicality, but -- yeah.

22 Q. Wait. Tell me that last part again. You do
23 think what had -- repeat that for me.

24 A. Sure. When I found out that he had resigned
25 from Louisiana Tech and reenrolled at ULL and graduated

1 with a clean record, I felt that he had not been held
2 accountable in any way for what he had done to me. I
3 had trusted that the people who I told who were
4 officials in this case -- that they were doing what
5 needed to be done behind the scenes to hold him
6 accountable for what it is that I had reported.

7 And so when I found out later via the Kenny
8 Jacoby article that -- that actually, seemingly, he --
9 he had kind of gotten off scot-free, that -- that was a
10 real, I think, blow to me and to -- it confirmed to me
11 that people would not believe me, is what it felt like,
12 that they would not believe what -- what had happened
13 to me and that they would not -- at least if they
14 believed me, that they would not take it as seriously
15 as I had taken it.

16 Q. You did -- going back to your report.
17 You reported to the Ruston Police Department on
18 December 14th, 2018; that was a Friday. And then
19 on Monday, December 17th, 2018, you were then -- you
20 then met with two represent- -- excuse me, two
21 administrators of Louisiana Tech University, correct?

22 A. Correct.

23 Q. And those were Dickie Crawford. And who was
24 the other one? Adam Collins?

25 A. That sounds correct, yes.

1 Q. Okay. And you met with them at what time on
2 that Monday?

3 A. I don't recall the time.

4 Q. And what did they tell you?

5 A. I don't -- I don't recall the exact words, but
6 the gist of the conversation was that Daniel had -- and
7 at this point, they were using his name -- Victor
8 Daniel Silva had withdrawn from school shortly after I
9 had reported. And it was not enough time for them to
10 get an investigation together, and so their hands were
11 tied when it came to investigating or taking any action
12 against him.

13 Q. Uh-huh.

14 A. They did tell me that were he to try to
15 reenroll at Louisiana Tech, I would be called to be a
16 witness for an academic misconduct hearing or something
17 like that. And so I think from that, I kind of
18 assumed, "Oh, okay. He's out, and he's" --

19 Q. He's gone?

20 A. He's gone. And everything that's been done
21 can -- could be done -- or has been done.

22 Q. And to be clear, they told you that he
23 withdrew from Tech University, correct?

24 A. I think they said either withdrew or resigned,
25 maybe.

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1 Q. Uh-huh. Okay. Did you take any action at
2 that point to -- did you drive by his apartment or take
3 any actions to determine if he had moved from Ruston?

4 A. Not -- no.

5 Q. Did you ask any friends? Did you confirm it
6 by talking to any friends or contacts that Silva left
7 Louisiana Tech University?

8 A. I don't recall, as I'm sitting here right now.

9 Q. You just took -- you took their word for
10 it and --

11 A. Yes.

12 Q. -- that was that?

13 A. Yes.

14 Q. Okay. Did you see him on campus since
15 December 17th, 2018?

16 A. No.

17 Q. Did you see him in Ruston after December 17th,
18 2018?

19 A. No.

20 MS. GIERING: Let's go off the record.

21 THE VIDEOGRAPHER: We are going off the
22 record. The time is 5:44.

23 (Recess taken.)

24 THE VIDEOGRAPHER: We are back on the
25 record at 5:50.

1 name?

2 A. I am not. She likes to think so, though.

3 MS. GIERING: Okay. I am going to pass
4 the witness.

5 MR. SCHEXNAYDER: Okay. How much time
6 do we have left?

7 MS. BECK: We have about seven minutes.

8 MR. SCHEXNAYDER: Okay. I don't know if
9 we're going to have enough time. I don't have
10 many questions, but six minutes, seven minutes
11 is pretty tight.

12 MS. BECK: You got -- the federal rules
13 provide for seven hours.

14 MR. SCHEXNAYDER: All right.

15 MS. BECK: So got to stick to it.

16 MR. SCHEXNAYDER: All right. Where do
17 you want me to do it from?

18 MS. BECK: Do you want to go off the
19 record?

20 THE VIDEOGRAPHER: Yeah, let's go off
21 the record. We're going off the record. The
22 time is 5:56.

23 (Recess taken.)

24 THE VIDEOGRAPHER: We are back on the
25 record at 5:57.

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EXAMINATION

BY MR. SCHEXNAYDER:

Q. Ms. Doe, my name is Grant Schexnayder. I'm here on behalf of Lafayette Consolid- -- Consolidated Government today. And they're involved in this lawsuit based on the allegations against the Lafayette Police Department. I know we've been here a long time today, so we're going to try to get out pretty soon.

For starters, is your phone an Apple or Android?

A. It's an Apple.

Q. Okay. And what about your previous phone?

A. Also Apple.

Q. Okay. Do you have any iCloud subscription or any sort of cloud service provider?

A. I -- I do have, like, an Apple ID.

Q. Okay. I know mine, I pay \$0.99 a month for iCloud storage.

A. I believe that's what I do, yes. I --

Q. Okay.

A. I'm not sure, as I'm sitting here.

Q. Do you have any idea how long you've had that subscription?

A. It's been recently -- actually, I believe I got it in 2020 when I got that new phone.

1 Q. Okay. Earlier today, we talked about two
2 media files. One was a Twitter screenshot, another was
3 a group chat screenshot that had Daniel Silva's photo
4 on it. On the group chat, I believe, it was the
5 Kappa Sigma screenshot.

6 Was there any discussion, after that was sent,
7 about Victor Daniel Silva?

8 A. I don't recall.

9 Q. Okay. Do you remember any messages at all
10 being sent after that screenshot?

11 A. At this time, I don't -- I don't recall.

12 Q. Okay. I mean, someone posted that screenshot
13 in your separate group chat. Are you aware of maybe
14 this screenshot went viral around campus and spread
15 around?

16 A. I don't know anything about that particular
17 screenshot, no.

18 Q. Okay. Did these stories about Victor Daniel
19 Silva -- was it spread throughout campus more than just
20 to yourself or to your group of friends?

21 MS. BECK: Objection; form.

22 A. I don't know how much it spread. It did
23 seem -- I can speak to my group of friends, and -- and
24 where it was spread in that group chat, yeah.

25 BY MS. GIERING:

1 Q. Okay. Did you send it to anyone else?

2 A. I don't recall at this time.

3 Q. Okay. What was communicated between yourself
4 and Kenneth Jacoby?

5 A. You know, I don't recall exactly what it was.
6 I know that we focused on -- he asked me for my
7 experience, and I -- I told him. So that was -- that's
8 what we focused on.

9 Q. Okay. Did he provide you with any
10 information?

11 A. As I'm sitting here right now, I -- I don't
12 recall, yeah.

13 Q. Okay. Is it possible that he might have
14 provided you with information?

15 A. It's possible.

16 Q. Okay. Was there any new information you
17 learned when you read his article?

18 A. Yes.

19 Q. If you just generally say what that
20 information was?

21 A. I did not know -- up until that -- I guess
22 it's easiest to say what I -- that I knew up until that
23 point were all allegations, again, that -- that
24 screenshot that I had been sent. I did not realize
25 the -- the law that he mentioned. I did not understand

1 the previous allegations against him and that there had
2 actually been reports to the other schools and to other
3 police departments, specifically the Lafayette Police
4 Department. I didn't realize that there were so many
5 reports to Lafayette Police Department. I -- there's a
6 number of things. I can't recall them all right now,
7 but there's a number of things that I learned from that
8 article.

9 Q. Was reading that article the first instance
10 where you -- Lafayette Police Department ever crossed
11 your mind as it related to Victor Daniel Silva?

12 A. I -- I believe so, yes.

13 Q. Okay. We talked about Andie Richard earlier
14 today and her Twitter account. And I believe your
15 testimony was that you followed her on Twitter?

16 A. Yes.

17 Q. We also have a screenshot of one of her tweets
18 that you said that you read. Is that correct?

19 A. Correct.

20 Q. Was that a chain? Were there more messages
21 below that, posted by Andie Richard?

22 A. I know the one that -- there's -- there's a
23 screenshot of one more. I'm not -- right now, I can't
24 recall if there were others below that.

25 Q. And I'm asking because oftentimes, when I'm

1 scrolling down Twitter, someone will make one, and then
2 it'll be a thread because there's a character count,
3 and there will be several on the same subject.

4 A. Yes.

5 Q. So I was curious if that might have been the
6 case with this tweet?

7 A. I -- yeah, I don't -- I don't remember about
8 the specific tweet, if there were more.

9 Q. Okay. Did you review any other of her tweets?

10 A. Again, as I'm sitting here, I can't remember
11 what I did and didn't see.

12 Q. Have you ever clicked on her profile and
13 scrolled down?

14 A. I did follow her, so I -- I would assume so.

15 Q. Okay. Did you -- and I'm not sure. Maybe you
16 just answered it. But did you come across any tweets
17 of hers about Victor Daniel Silva?

18 A. I know she -- she posted regularly about him.
19 In that original tweet that I saw, she said, "It's been
20 a while since I posted about him." And so if I saw
21 others, I -- again, I can't speak to that.

22 Q. Okay.

23 A. Yeah.

24 Q. But as you're sitting here today, your
25 memory -- do you remember any other posts besides what

1 was produced in an exhibit today?

2 A. I don't remember, as I'm sitting here today,
3 any other posts.

4 MR. SCHEXNAYDER: Those are all the
5 questions I have. Thank you.

6 THE WITNESS: Thank you.

7 RE-EXAMINATION

8 BY MS. GIERING:

9 Q. Did you tell your parents about this incident?

10 A. No, not until the article had been released.

11 Q. When it was published?

12 A. Yes, when it was published.

13 Q. Did you give your parents a heads up that that
14 article was going to be published?

15 A. No.

16 Q. When Kenny Jacoby contacted you, did he
17 identify himself as a journalist with USA Today?

18 A. Yes.

19 Q. Okay. He told you that he was investigating a
20 story about Victor Daniel Silva?

21 A. Yes.

22 Q. Okay. Did he -- and he told you that's what
23 led him to you?

24 A. Yes, I -- I believe so.

25 Q. How did he find out about you?

1 MS. BECK: Objection; form.

2 A. As I'm sitting here right now, I -- I don't
3 recall how --

4 BY MS. GIERING:

5 Q. Did you ask him?

6 A. -- how he -- how he found out about me.

7 MS. BECK: We're at -- we're at seven.

8 MS. GIERING: Okay.

9 BY MS. GIERING:

10 Q. Just answer the question, the last question I
11 asked.

12 A. I -- I don't recall, as I'm -- as I'm
13 sitting here, if I asked him. Yeah, I don't -- I don't
14 recall.

15 THE VIDEOGRAPHER: Okay. Counsel, you
16 want to let her know about reading and signing
17 before we go off the record.

18 MS. BECK: She will read and sign.

19 THE VIDEOGRAPHER: She will read and
20 sign, excellent.

21 Okay. We're going off the record.

22 This is the conclusion of the deposition of
23 Jane Doe. The --

24 Yeah. Oh, I thought you were going to
25 tell me something.

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The time is 6:04. We are off.
(This proceeding was concluded at 6:04 p.m. on
September 20, 2023.)

REPORTER'S PAGE

I, YOLANDA J. PENA, Certified Court Reporter in and for the State of Louisiana, (CCR #2017002), Registered Professional Reporter (RPR #970346), the officer, as defined in Rule 28 of the Federal Rules of Civil Procedure and/or Article 1434(B) of the Louisiana Code of Civil Procedure, do hereby state on the record:

That due to the interaction in the spontaneous discourse of the proceeding, double dashes (--) have been used to indicate pauses, changes in thought, and/or talkovers; that same is the proper method for a transcription of proceedings, and that the double dashes (--) do not indicate that words or phrases have been left out of this transcript;

That any spelling of words and/or names which could not be verified through reference material have been denoted with the parenthetical "(phonetic)";

That the parenthetical "(sic)" is used to denote when a witness stated a word or phrase that appears odd or erroneous to show that it was quoted exactly as it stands.

A handwritten signature in black ink, appearing to read 'Yolanda J. Pena', with a stylized flourish at the end.

YOLANDA PENA, CCR, RPR

REPORTER'S CERTIFICATE

I, YOLANDA J. PENA, Certified Court Reporter in and for the State of Louisiana, Registered Professional Reporter, and as the officer before whom this testimony was taken, do hereby certify that JANE DOE, after having been duly sworn by me upon authority of R.S. 37:2554, did testify as set forth in the foregoing 330 pages.

I further certify that said testimony was reported by me in the Stenotype reporting method, was prepared and transcribed by me or under my direction and supervision, and is a true and correct transcript to the best of my ability and understanding.

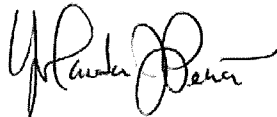
I further certify that the transcript has been prepared in compliance with transcript format guidelines required by statute or by rules of the board and that I have been informed about the complete arrangement, financial or otherwise, with the person or entity making arrangements for deposition services.

I further certify that I have acted in compliance with the prohibition on contractual relationships, as defined by Louisiana Code of Civil Procedure Article 1434, and in rules and advisory opinions of the board.

I further certify that I am not an attorney or counsel for any of the parties, that I am neither related to nor employed by any attorney or counsel connected with this action, and that I have no financial interest in the outcome of this matter.

This certificate is valid only for this transcript, accompanied by my original signature and original raised seal on this page.

Prairieville, Louisiana, this 4th day of October, 2023.



YOLANDA J. PENA, CCR, RPR
CCR NO. 2017002, RPR NO. 907346